

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SYMBOLGY INNOVATIONS LLC,)	
)	C.A. No. 1:19-cv-01654-RGA
Plaintiff,)	
)	
v.)	TRIAL BY JURY DEMANDED
)	
MONDELEZ GLOBAL LLC,)	
)	
Defendant.)	
)	

UNOPPOSED MOTION TO STAY
ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Symbolgy Innovations LLC, by and through undersigned counsel and subject to the approval of this Court, hereby files this Unopposed Motion to Stay All Deadlines and Notice of Settlement, and in support thereof, respectfully shows the Court as follows:

All matters in controversy between Plaintiff and Defendant Mondelez Global LLC have been settled in principle. The parties are in the process of memorializing the terms of a written settlement agreement. The parties anticipate that they will be able to perform such terms within sixty (60) days. Accordingly, Plaintiff respectfully requests that the Court grant a stay of the proceedings between the parties, including all deadlines, until March 23, 2020. Defendant is unopposed to the relief requested herein.

Good cause exists for granting this Unopposed Motion, as set forth above. The motion is not filed for purposes of delay but so that justice may be served.

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Plaintiff conferred with Defendant about the issues presented here. Defendant indicated that it was not opposed to the relief sought herein.

Dated: January 22, 2020

By: /s/Stamatios Stamoulis

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Symbology Innovations LLC

SO ORDERED this _____ day of _____, 2020

United States District Court Judge